



Surveillance Impact Report

Social Media Monitoring Software

Multiple Departments within the City and County of San Francisco

As required by San Francisco Administrative Code, Section 19B, departments must submit a Surveillance Impact Report for each surveillance technology to the Committee on Information Technology ("COIT") and the Board of Supervisors.

The Surveillance Impact Report details the benefits, costs, and potential impacts associated with the Department's use of Social Media Monitoring Software, (hereinafter referred to as "surveillance technology").

This Surveillance Impact Report applies to the use of social media monitoring software and technology by the following city and county departments:

- Airport
- Arts Commission
- Assessor – Recorder Office
- Asian Art Museum
- City Administrator's Office – 311
- City Administrator's Office – Animal Care & Control
- City Administrator's Office – Central Office
- City Administrator's Office – Office of Civic Engagement and Immigrant Affairs
- City Administrator's Office – Office of Transgender Initiatives
- City Planning Department
- Controller's Office
- Department of Building Inspection
- Department of Children, Youth, and their Families
- Department of Early Childhood
- Department of Emergency Management
- Department of Homelessness and Supportive Housing
- Department of Police Accountability
- Department of Public Health
- Department of Technology and SFGov/ SFGovTV
- Environment Department
- Ethics Commission
- Human Rights Commission
- Mayor's Office
- Municipal Transportation Agency
- Office of Economic and Workforce Development
- Port of San Francisco
- Public Utilities Commission
- Recreation and Park Department

Surveillance Oversight Review Dates

PSAB Review: 06/08/2023 (list all dates at PSAB, write "Recommended: MM/DD/202X" for rec date)

COIT Review: TBD (list all dates at COIT, and write "Recommended: MM/DD/202X" for rec date)

Board of Supervisors Approval: TBD

DESCRIPTION OF THE TECHNOLOGY

The Departments use the surveillance technology to communicate with members of the public about departmental programs, services, and news.

The Departments shall use the surveillance technology only for the following authorized purposes:

Authorized Use(s):

<i>– Publish the Department’s content on social media.</i>
<i>– Communicate with social media users about Department news and share information on services offered through various social media channels.</i>
<i>– Analyze data gathered from social media sources to optimize outreach to general public and achieve Department’s communication objectives.</i>

The technology may be deployed in the following locations, based on use case:

This technology is a software which is used by city and county staff on city-issued devices to communicate with members of the public through the Internet.

Technology Details

This is a product description of the technology:

A social media monitoring technology is a technology from which a department can review all their social media accounts in one place, search all accounts and public content at once by typing in key words through a dashboard interface, schedule posts in advance on social media platforms and analyze the engagement with those posts. While the specific functions of each tool may vary, the technology often allows conversations to be labeled for later reference and can save content posted to social media platforms by other users. Search terms can be saved so that they can be repeated in the future, supporting customized monitoring across social media platforms.

Examples of social media monitoring technologies potentially used by the listed Departments include:

- AgoraPulse
- Archive Social
- Buffer
- Critical Mention
- Falcon/ Brandwatch
- Hootsuite
- Later.com

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Social Media Monitoring Software

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- Meltwater
- Meta Business Manager and Meta Business Suite
- Sendible
- Sprout Social
- Tweetdeck

This is a description of how the technology works:

To function, the surveillance technology is a social network manager that allows users to create custom views of all connected social networks. The technology can be used to post to multiple social media accounts, manage social media messaging, and coordinate the organization's social media marketing. The platform aggregates social media feeds so that content and trends can be viewed holistically.

Third-Party Vendor Access to Data

All data collected or processed by the surveillance technology will be handled or stored by an outside provider or third-party vendor on an ongoing basis. Specifically, data will be handled by the third-party company which provides the social media monitoring software to ensure the Department may continue to use the technology.

IMPACT ASSESSMENT

The impact assessment addresses the conditions for surveillance technology approval, as outlined by the Standards of Approval in San Francisco Administrative Code, Section 19B:

1. The benefits of the surveillance technology outweigh the costs.
2. The Department's Policy safeguards civil liberties and civil rights.
3. The uses and deployments of the surveillance technology are not based upon discriminatory or viewpoint-based factors and do not have a disparate impact on any community or Protected Class.

The Department's use of the surveillance technology is intended to support and benefit the residents of San Francisco while minimizing and mitigating all costs and potential civil rights and liberties impacts of residents.

A. Benefits

The Department's use of the surveillance technology has the following benefits for the residents of the City and County of San Francisco:

Description

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Education	The technology allows the department to inform the public about city and county – provided programs, services, facilities and or benefits using social media services that the public already uses.
Community Development	The technology allows the department to communicate with San Francisco residents about city and county-provided programs, services, facilities, and/or benefits. It also allows the department to gather community feedback via social media engagement by residents with the department’s social media accounts.

B. Civil Rights Impacts and Safeguards

The Department has considered the potential impacts and has identified the technical, administrative, and physical protections as mitigating measures:

- Discrimination: Although the information on social media websites is by default public and exists in the public sphere, there is documented evidence that shows that federal entities in the United States have used social media monitoring technologies to collect information about individuals or groups as part of investigations, sometimes without sufficient justification or oversight. These investigations can target certain ethnic groups or nationalities. If the technology is used in this way, it could lead to discriminatory outcomes.
- Loss of Liberty & Loss of Trust: Governments could misuse social media monitoring tools to identify and target individuals or groups expressing dissenting opinions or criticizing government policies. This could lead to unwarranted surveillance and a chilling effect on freedom of speech and expression. Additionally, this can erode trust in government.

The administrative safeguards are that the Departments will make sure that only authorized personnel have access to the surveillance technology. Access will be revoked if someone moves to a job without approved access.

The technical safeguards are that the surveillance technology access will be password protected, with passwords that comply with cybersecurity best practices. Departments will only use platforms that pass internal cybersecurity approvals. Authorized personnel will only access the technology from applications and devices approved for use by city and county cybersecurity standards.

C. Fiscal Analysis of Costs and Benefits

The Department’s use of the surveillance technology yields the following business and operations benefits:

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Financial Savings	The social media monitoring software presents financial benefits by reducing the number of staff who need to work on the Department’s social media work
Time Savings	The social monitoring software helps the Department save time by allowing social media management with fewer staff members than would be needed if the software was not being used.

Appendix A lists the fiscal cost, such as initial purchase, personnel and other ongoing costs, for the surveillance technologies used by each department.

COMPARISON TO OTHER JURISDICTIONS

The surveillance technology is currently utilized by other governmental entities for similar purposes. Other government entities have used the surveillance technology in the following way:

Social media monitoring technology has been used by many local, state and national government entities in the United States and internationally to engage their constituents and communicate effectively with them using social media platforms for engagement. Platforms such as Hootsuite and Meltwater report¹ that government entities and other organizations in the public sector use their services, such as Barcelona City Council, the government of British Columbia, the West Midlands Police Department, the city of Boston and the London Metropolitan Police Department.

While many government entities use these platforms to communicate quickly and effectively with constituents, social media monitoring technologies have also been used by law enforcement entities, such as the Department of Homeland Security, the Federal Bureau of Investigation, and the State Department, to gather information about social media users for investigations². These kinds of investigations can particularly impact immigrants to a country where they have not yet acquired citizenship³.

¹ See Hootsuite at <https://www.hootsuite.com/industries/government> and Meltwater at <https://www.meltwater.com/en/industry/public-sector>).

² See Brennan Center for Justice report at <https://www.brennancenter.org/our-work/research-reports/social-media-surveillance-us-government#:~:text=The%20Department%20of%20Homeland%20Security,to%20screening%20travelers%20and%20immigrants>).

³ See ACLU report at <https://www.aclu.org/news/national-security/is-the-government-tracking-your-social-media-activity>

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The effectiveness of the surveillance technology while used by government entities is determined to be the following:

Social media monitoring technologies allow for government entities to better understand social media trends, how people are communicating online about certain topics, and how they are interacting with certain accounts across the social media ecosystem. A social media monitoring technology assists its users with those goals.

Social media monitoring tools also allow government entities to quickly share important announcements, news updates, and emergency information with their communities, across platforms. This real-time communication can be particularly effective in situations where immediate action or awareness is required. Moreover, the tools offer a more time-efficient way of reaching a large audience given one post can be placed across various social media platforms, reducing the time it takes to communicate with the public.

The adverse effects of the surveillance technology while it has been used by other government entities are:

Effect	Description
Civil Rights and/or Civil Liberties Abuse	Government entities can use the tools included in social media monitoring technologies to surveil communications and investigate people in spaces of communication. These tools make it easier to search for key words and to monitor trends in speech, which could make people not want to speak freely or organize protests that are lawful.

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Appendix A: Financial Information per Department

Note:

- **Airport**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	0941, 0931 & 0923 – Managers (3) 9254 - Web Master (1) 1312 - Social Media Specialist (1) 0932 & 0922 - Customer Service Managers (Mgr. IV & I) (2) Wag Brigade staff Airport Museum Staff	
	Annual Cost	One-Time Cost
Total Salary & Fringe	\$72,000.00	
Software	\$60,000.00	
Hardware/Equipment	\$0.00	
Professional Services	\$0.00	
Training	\$0.00	
Other	\$0.00	
Total Cost	\$132,000.00	

The Department funds its use and maintenance of the surveillance technology through:
 Self-Supporting (Operating Expense).

- **Arts Commission**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	1312 - Public Information Officer (1) 1314 - Public Relations Officer (1) 1840 - Junior Management Assistant (1) 1842 - Management Assistant (1)	
	Annual Cost	One-Time Cost
Total Salary & Fringe	\$503,830.00	
Software	\$14,137.00	
Hardware/Equipment	\$0.00	
Professional Services	\$0.00	
Training	\$0.00	
Other	\$0.00	

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Social Media Monitoring Software
 Multiple Departments within the City and County of San Francisco

Total Cost	\$517,967.00	
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The Department funds its use and maintenance of the surveillance technology through:
 General Fund.

- **Assessor – Recorder Office**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	1070 - IT Director (1)	
	Annual Cost	One-Time Cost
Total Salary & Fringe		
Software		
Hardware/Equipment		
Professional Services		
Training		
Other		
Total Cost		

There are no costs for the technology.

- **Asian Art Museum**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	This is a Foundation position, not a City of San Francisco position, and the job classification is not a City classification. There is less than one FTE assigned to support this technology.	
	Annual Cost	One-Time Cost
Total Salary & Fringe	\$50,000	
Software		
Hardware/Equipment		
Professional Services		
Training		
Other		
Total Cost	\$50,000	

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The Department funds its use and maintenance of the surveillance technology through:
 Self-Supporting.

- **City Administrator’s Office – 311**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	1324 - Customer Service Agent (20) 1326 - Customer Service Supervisors (6) 0933 - Deputy Director or Call Center Manager (2) 1822 - Administrative Analyst (1) 1053 - Senior Business Analyst (1) <i>Note: Working with Social Media Monitoring Technology only is a fraction of the work that the people in each of these job titles does.</i>	
	Annual Cost	One-Time Cost
Total Salary & Fringe	\$0.00	
Software	\$4,050.00	
Hardware/Equipment	\$0.00	
Professional Services	\$0.00	
Training	\$0.00	
Other	\$0.00	
Total Cost	\$4,050.00	

The Department funds its use and maintenance of the surveillance technology through:
 General Fund.

- **City Administrator’s Office - Animal Care & Control**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	1310 - Public Relations Assistant (1)	
	Annual Cost	One-Time Cost
Total Salary & Fringe		
Software		
Hardware/Equipment		
Professional Services		
Training		
Other		

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Social Media Monitoring Software
 Multiple Departments within the City and County of San Francisco

Total Cost		
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There are no costs for the technology, as the technology provider does not charge for the technology.

- **City Administrator’s Office – Central Office**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	1822 – Administrative Analyst (1) 1823 – Senior Administrative Analyst (1) 9251 – Public Relations Manager (1)	
	Annual Cost	One-Time Cost
Total Salary & Fringe	\$0.00	
Software	\$3,450.00	
Hardware/Equipment	\$0.00	
Professional Services	\$0.00	
Training	\$0.00	
Other	\$0.00	
Total Cost	\$3,450.00	

The Department funds its use and maintenance of the surveillance technology through:
 General Fund.

- **City Administrator’s Office – Office of Civic Engagement and Immigrant Affairs**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	1844 - Senior Communications Specialist (1)	
	Annual Cost	One-Time Cost
Total Salary & Fringe	\$0.00	
Software	\$60.00	
Hardware/Equipment	\$0.00	
Professional Services	\$0.00	
Training	\$0.00	
Other	\$0.00	
Total Cost	\$60.00	

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The Department funds its use and maintenance of the surveillance technology through:
 General Fund.

- **City Administrator’s Office – Office of Transgender Initiatives**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	0932 - Manager IV (1) 1842 - Management Assistant (1)	
	Annual Cost	One-Time Cost
Total Salary & Fringe		
Software		
Hardware/Equipment		
Professional Services		
Training		
Other		
Total Cost		

There are no costs for the technology. The Department does not need to fund the technology, as it is offered for free by the company which makes it.

- **City Planning Department**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	1827 – Administrative Services Manager (1)	
	Annual Cost	One-Time Cost
Total Salary & Fringe		
Software		
Hardware/Equipment		
Professional Services		
Training		
Other		
Total Cost		

There are no costs for the technology.

- **Controller’s Office**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

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Number of Budgeted FTE (new & existing) & Classification	0922 – Communications & Engagement Manager	
	Annual Cost	One-Time Cost
Total Salary & Fringe		
Software		
Hardware/Equipment		
Professional Services		
Training		
Other		
Total Cost		

The Department has no costs as they do not currently own the technology.

- **Department of Building Inspection**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	0923 Manager II (1) 1452 Executive Secretary II (1)	
	Annual Cost	One-Time Cost
Total Salary & Fringe		
Software		
Hardware/Equipment		
Professional Services		
Training		
Other		
Total Cost		

There are no costs for the technology.

- **Department of Children, Youth, and their Families**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	9774 – Senior Community Development Specialist (1)	
	Annual Cost	One-Time Cost
Total Salary & Fringe	\$172,000	
Software		

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Hardware/Equipment		
Professional Services		
Training		
Other		
Total Cost	\$172,000	

The Department funds its use and maintenance of the surveillance technology through:
General Fund.

- **Department of Early Childhood**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	<ul style="list-style-type: none"> • 1823 Senior Administrative Analyst (1) • 9774 Senior Community Development Specialist (1) 	
	Annual Cost	One-Time Cost
Total Salary & Fringe		
Software		
Hardware/Equipment		
Professional Services		
Training		
Other		
Total Cost		

There are no costs for the technology.

- **Department of Emergency Management**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	0900 series employees (5) 8604 – Emergency Services Coordinator IV (2) 8603 – Emergency Services Coordinator III (4) 8602 – Emergency Services Coordinator II (7)	
	Annual Cost	One-Time Cost
Total Salary & Fringe		
Software		
Hardware/Equipment		
Professional Services		

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Training		
Other		
Total Cost		

The Department does not fund its use and maintenance of the surveillance technology, as the surveillance technology is offered for free by the company which provides it.

- **Department of Homelessness and Supportive Housing**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	1312 Public Information Officer (1) 1824 Principal Administrative Analyst (1) 0953 Deputy Director III (1)	
	Annual Cost	One-Time Cost
Total Salary & Fringe		
Software		
Hardware/Equipment		
Professional Services		
Training		
Other		
Total Cost		

The Department does not fund its use and maintenance of the surveillance technology, as the surveillance technology is offered for free by the company which provides it.

- **Department of Police Accountability**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	1052 – IS Business Analyst (1) 0923 - Manager II (1)	
	Annual Cost	One-Time Cost
Total Salary & Fringe		
Software		
Hardware/Equipment		
Professional Services		
Training		
Other		
Total Cost		

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There are no costs for the technology, as the department does not yet own the technology.

- **Department of Public Health**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	1312 - Public Information Officer (0.5)	
	Annual Cost	One-Time Cost
Total Salary & Fringe	\$57,585.00	
Software	\$8,699.00	
Hardware/Equipment		
Professional Services		
Training		
Other		
Total Cost	\$66,284.00	

The Department funds its use and maintenance of the surveillance technology through:
 Self-Supporting.

- **Department of Technology and SFGov/ SFGovTV**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	1767 - Media Programming Specialist (1)	
	Annual Cost	One-Time Cost
Total Salary & Fringe	\$0.00	
Software	\$9,300.00	
Hardware/Equipment	\$0.00	
Professional Services	\$0.00	
Training	\$0.00	
Other	\$0.00	
Total Cost	\$9,300.00	

The Department funds its use and maintenance of the surveillance technology through:
 General Fund.

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- **Environment Department**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	5638 – Environmental Assistant	
	Annual Cost	One-Time Cost
Total Salary & Fringe	\$109,791.50	
Software	\$142,341.39	
Hardware/Equipment	\$0.00	
Professional Services	\$0.00	
Training	\$500.00	
Other	\$0.00	
Total Cost	\$252,132.89	

The Department funds its use and maintenance of the surveillance technology through:
General Fund, Self-Supporting, Grant.

- **Ethics Commission**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	1230 - Instructional Designer (1) 1823 -Senior Administrative Analyst (2) 1824 – Principal Administrative Analyst (1)	
	Annual Cost	One-Time Cost
Total Salary & Fringe		
Software		
Hardware/Equipment		
Professional Services		
Training		
Other		
Total Cost		

There are no costs for the technology.

- **Human Rights Commission**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

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Number of Budgeted FTE (new & existing) & Classification	1312 - Public Information Officer (1) 2991 - Coordinator, Human Rights Commission (1) 0923 - Manager II (1)	
	Annual Cost	One-Time Cost
Total Salary & Fringe		
Software		
Hardware/Equipment		
Professional Services		
Training		
Other		
Total Cost		

There are no costs for the technology.

- **Mayor’s Office**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	0886 - Mayoral Staff VI (1)	
	Annual Cost	One-Time Cost
Total Salary & Fringe		
Software		
Hardware/Equipment		
Professional Services		
Training		
Other		
Total Cost		

The cost of the technology is covered by the Department of Technology’s/ SFGovTV’s yearly contract, covering the Mayor’s office.

- **Municipal Transportation Agency**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	9172 – Manager II, Municipal Transportation Agency (1) 9177 – Manager III, Municipal Transportation Agency (1) 9179 - Manager V, Municipal Transportation Agency (1) 1822 - Administrative Analyst (2)	
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	1314 – Public Relations Officer (2) 1312 – Public Information Officer (1) 1310 – Public Relations Assistant (2) 1840 – Junior Management Assistant (1) 1052 – IS Business Analyst (1)	
	Annual Cost	One-Time Cost
Total Salary & Fringe	\$2,331,753.00	
Software	\$45,480.00	
Hardware/Equipment	\$0.00	
Professional Services	\$0.00	
Training	\$0.00	
Other	\$0.00	
Total Cost	\$2,377,233.00	

The Department funds its use and maintenance of the surveillance technology through:
Self-Supporting.

- **Office of Economic and Workforce Development**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	1823 - Senior Administrative Analyst (2) 9910 – Public Service Assistant (1) <i>Note: Social media technology use comprises 20% or less of these roles.</i>	
	Annual Cost	One-Time Cost
Total Salary & Fringe	\$0.00	\$0.00
Software	\$0.00	\$0.00
Hardware/Equipment	\$0.00	\$0.00
Professional Services	\$0.00	\$0.00
Training	\$0.00	\$0.00
Other	\$0.00	\$0.00
Total Cost	\$0.00	\$0.00

There are no costs for the technology.

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Multiple Departments within the City and County of San Francisco

- **Port of San Francisco**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	1312 - Public Information Officer (1)	
	Annual Cost	One-Time Cost
Total Salary & Fringe	\$0.00	
Software	\$1,788.00	
Hardware/Equipment	\$0.00	
Professional Services	\$0.00	
Training	\$0.00	
Other	\$0.00	
Total Cost	\$1,788.00	

The Department funds its use and maintenance of the surveillance technology through:
Self-Supporting.

- **Public Utilities Commission**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	1312 - Public Information Officer (1) 9252 - Communications Specialist (1)	
	Annual Cost	One-Time Cost
Total Salary & Fringe	\$0.00	
Software	\$17,268.00	
Hardware/Equipment	\$0.00	
Professional Services	\$0.00	
Training	\$0.00	
Other	\$0.00	
Total Cost	\$17,268.00	

The Department funds its use and maintenance of the surveillance technology through:
Self-Supporting.

- **Recreation and Park Department**

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Surveillance Oversight Review Dates

PSAB Review: 06/08/2023 (list all dates at PSAB, write "Recommended: MM/DD/202X" for rec date)

COIT Review: TBD (list all dates at COIT, and write "Recommended: MM/DD/202X" for rec date)

Board of Supervisors Approval: TBD

Social Media Monitoring Software
 Multiple Departments within the City and County of San Francisco

Number of Budgeted FTE (new & existing) & Classification	3374 – Volunteer/ Outreach Coordinator (2)	
	Annual Cost	One-Time Cost
Total Salary & Fringe	\$33,702.00	
Software	\$6,000.00	
Hardware/Equipment	\$0.00	
Professional Services	\$0.00	
Training	\$0.00	
Other	\$0.00	
Total Cost	\$39,702.00	

The Department funds its use and maintenance of the surveillance technology through the General Fund.

Surveillance Oversight Review Dates

PSAB Review: 06/08/2023 (list all dates at PSAB, write "Recommended: MM/DD/202X" for rec date)
 COIT Review: TBD (list all dates at COIT, and write "Recommended: MM/DD/202X" for rec date)
 Board of Supervisors Approval: TBD